

IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

JENNIFER DORSEY,	)	
	)	
Petitioner	)	
	)	CIVIL NO: 2:07cv831-MEF
v.	)	
	)	
UNITED STATES OF AMERICA,	)	
	)	
Respondent	)	

MOTION FOR A SECOND EXTENSION OF TIME TO  
RESPOND TO MOTION PURSUANT TO 28 U.S.C. § 2255

Comes now the United States of America, by and through Leura G. Canary, United States Attorney for the Middle District of Alabama, and moves this Court for an extension of time to respond to the Petitioner's motion pursuant to 28 U.S.C. § 2255. In support of the above-referenced motion, states as follows:

1. On the 16th day of October, 2007, this Honorable Court ordered the United States to respond to the defendant's § 2255 motion within thirty days of the Court's Order. The Court further ordered that the "government shall attach to its response those portions of the trial record, including the plea agreement, guilty plea proceeding, and/or sentencing transcript, that are pertinent to a determination of the issues presented in this cause of action." The government spoke with court reporter Risa Entrekin, who was the court reporter during the plea hearing. Mrs. Entrekin is also transcribing the sentencing hearing in the above-cited case

due to the death of Jimmy Dickens. Mrs. Entrekin has informed the government that she is and has been attempting to complete the transcript for the Seigelman/Scrushy trial. She is only working on the Seigelman/Scrushy trial transcript until December 6, 2007. However, after December 6, 2007, she will be able to direct her attention to the transcripts in the instant case.

2. While the government is confident that during the plea colloquy the Court reviewed with the petitioner the waiver of the right to attack the sentence in any post-conviction proceeding, the government must be able to prove such. In order to prove such, the government must have the transcript.

3. Accordingly, the United States requests an extension of forty-five (45) days in which to respond to the defendant's § 2255 motion.

Respectfully submitted this the 14<sup>th</sup> day of November, 2007.

LEURA G. CANARY  
UNITED STATES ATTORNEY

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ASB-1613-N77A

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CERTIFICATE OF SERVICE

I hereby certify that on November 14, 2007, I have mailed by United States Postal Service the document to the following non-CM/ECF participant: Jennifer Dorsey, Prisoner No. 11759-002, Marianna Federal Prison Camp, Cherokee A, Post Office Box 7006, Marianna, Florida 32447-7006.

Respectfully submitted,

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